

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

HIS ALL HOLINESS, BARTHOLOMEW I,  
THE ARCHBISHOP OF CONSTANTINOPLE,  
NEW ROME, AND ECUMENICAL  
PATRIARCH; THE HOLY METROPOLIS OF  
DRAMA; AND THE MONASTERY OF  
THEOTOKOS EIKOSIPHONISSA,

Plaintiffs,

vs.

PRINCETON UNIVERSITY,

Defendant.

Case No. 3:18-cv-17195-RK-DEA

Honorable Robert Kirsch, U.S.D.J.

Honorable Rukhsanah L. Singh, U.S.M.J.

**AFFIRMATION OF GEORGE A.  
TSOUGARAKIS**

I, George A. Tsougarakis, an attorney admitted to practice law before the Courts of New Jersey and before the United States District Court for the District of New Jersey, herby affirm under penalty of perjury:

1. I am of counsel to Hartmann Doherty Rosa Berman & Bulbulia LLC, co-counsel for Plaintiffs in the above-captioned action. I make this Affirmation on the basis of my personal knowledge and information provided to me.

2. In or about January 2024, I communicated with Patriarchal Deacon, Father Aetios Nikiforos, Grand Ecclesiarch and the director of the Patriarchal Private Office, (“Father Aetios”) concerning this Court’s order requiring the Plaintiffs in this lawsuit—namely His All Holiness Patriarch Bartholomew, the Metropolis of Drama (the “Metropolis”), and the Monastery of Theotokos Eikosiphoinissa (the “Monastery”) —to produce Professor George Papazoglou for a deposition.

3. In or about January 2024, Father Aetios called Professor George Papazoglou to convey the Patriarchate’s request that he voluntarily appear for a deposition to be taken by Princeton University.

4. On January 17, 2024, Father Aetios conveyed the contents of his conversation with Professor Papazoglou to me. Father Aetios conveyed that he made clear to Professor Papazoglou that he was requesting on behalf of the Patriarchate that Professor Papazoglou voluntarily appear for the deposition. Professor Papazoglou agreed to consider the Patriarchate's request.

5. On January 22, 2024, Plaintiffs were served with Defendant's Amended Notice of the Deposition of George K. Papazoglou, dated January 19, 2024.

6. On January 25, 2024, Defendant's Amended Notice of the Deposition of George K. Papazoglou, dated January 19, 2024, was conveyed by Plaintiffs' counsel to Professor Papazoglou via e-mail.

7. In or about early February 2024, Father Aetios informed me that in a subsequent conversation, with Professor Papazoglou, the Professor denied the Patriarchate's request to sit for a deposition, indicating that as a Greek citizen he is not required to voluntarily submit to a deposition for a case in the United States. The Professor also told Father Aetios that in any event, he refused to testify about any of his discussions with Metropolitan Pavlos of blessed memory because he considered them to be confidential.

8. Father Aetios told me that he encouraged Professor Papazoglou to reconsider his decision and expressed the Patriarchate's support for the deposition, but Professor Papazoglou, again, refused to sit for the deposition.

9. In or about early February 2024, Professor Papazoglou also reached out to me via an unscheduled phone call to confirm that he would not voluntarily comply with Princeton's request for a deposition. I clarified that it was also Plaintiffs' request that he appear, but Professor Papazoglou said that he would never sit for the deposition.

10. Attached hereto as Exhibit A is a true and correct copy of Defendant's Amended Notice of the Deposition of George K. Papazoglou, dated January 19, 2024.

11. Attached hereto as Exhibit B is a true and correct copy of an excerpt of the transcript from the deposition of Alexander Apostolidis (a.k.a. Metropolitan Pavlos of the Metropolis of Drama, Greece).

12. I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 17, 2024

Respectfully submitted,

HARTMANN DOHERTY ROSA BERMAN  
& BULBULIA LLC

By: s/ George A. Tsougarakis  
George A. Tsougarakis

433 Hackensack Avenue, Suite 1002  
Hackensack, New Jersey 07601  
Telephone: 201-441-9056

*Attorneys for Plaintiffs His All Holiness,  
Bartholomew I, the Archbishop of  
Constantinople, New Rome, and Ecumenical  
Patriarch; the Holy Metropolis of Drama;  
and the Monastery of Theotokos  
Eikosiphoinissa*